DEFENSE LOGISTICS AGENCY
DEFENSE NATIONAL STOCKPILE CENTER
8725 JOHN J. KINGMAN ROAD, SUITE 3339
FT. BELVOIR, VIRGINIA 22060-6223

IN REPLY REFER TO

DNSC-O

MAR 19 1998

MEMORANDUM FOR ALL DNSC FACILITIES

SUBJECT: DNSC Pollution Prevention Plan

Pursuant to Executive Order 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements, August 3, 1993, the attached document is our policy and plan to address the requirements of this Presidential order.

Review the attached document carefully, and if we are not already complying with these requirements, we need to review our operations and make the appropriate changes to comply. Most of our facilities are making some efforts in the specific areas of concern but I am sure we can do more to reduce and prevent pollution at our sites. This plan highlights the areas I feel we can make significant changes in our operation to accomplish compliance and be a leader in environmental pollution prevention.

Maintain this plan on file and all efforts made to comply with the established requirements should be documented and maintained. These records will be made available to regulatory inspections and the public upon request, so make sure your documents are in order.

Should you have any questions please contact Kevin Reilly on 767-6522.

RICHARD J. CONNELLY
Administrator

Attachment

DNSC

POLLUTION PREVENTION PLAN

INTRODUCTION

POLLUTION PREVENTION

Pollution prevention refers to the use of materials, processes, or practices that reduces or eliminate the quantity and toxicity of wastes at the source of generation. It includes practices that eliminate discharge of hazardous or toxic chemicals to the environment and that protect natural resources through conservation and improved efficiency. Pollution prevention aims to eliminate or reduce all waste (not just hazardous) released to land, air, and water without simply transferring or distributing pollutants among these media.

Pollution prevention represents the first step in managing waste. Source reduction is assigned the highest priority because it reduces or eliminates wastes at the source of generation. Recycling is the next preferable approach because it involves the reuse or regeneration of materials and wastes into usable products. Treatment or disposal are considered last resort measures.

Source reduction is the use of materials, processes or practices that reduce or eliminate the quantity and toxicity of wastes at the source of generation. Source reduction techniques include practices such as raw material substitutions, improved operating practices, changes in industrial processes, and technological changes. Land use practices that prevent ecological impacts are also source reduction techniques. Examples include avoiding construction in wetland or other ecologically sensitive areas, minimizing land clearing to reduce erosion, and planning new construction to minimize the amount of impervious surfaces to reduce storm water runoff.

Recycling refers to the reuse or regeneration of materials and wastes into usable products and by-products. Recycling also refers to the reclamation of products that are no longer in use (e.g., reclaiming metals from outdated equipment). Recycling includes practices such as onsite or offsite recycling, materials exchange or reuse, recovery of materials, and composting of organic wastes, all of which help to reduce dependence on expensive virgin materials.

Federal agencies and facilities are directed to implement acquisition programs aimed at encouraging new technologies and building markets for environmentally preferable and recycled products. Known as affirmative procurement, it is the purchasing of alternative products that are environmentally preferable or that are made with the maximum amount of recovered material content. Purchasing products containing recovered materials

promotes the production of recycled products and closes the loop by creating markets for collected materials. Affirmative procurement is required by the Resource Conservation and Recovery Act (RCRA) and *Executive Order 12873, Federal Acquisition, Recycling, and Waste Prevention.*

Waste treatment changes the form or composition of a waste stream through a controlled reaction. Examples of treatment technologies include incinerating municipal solid waste, biological treatment of wastewater, thermal oxidation of solvent vapors. Treatment technologies reduce the volume of waste or create a less concentrated hazardous or toxic waste for disposal. The problem with treatment is that it often results in the transfer of hazardous substance from one medium to another (e.g., incineration can cause the movement of a hazardous substance from a solid to air; wastewater treatment creates sludge); consequently, treatment is not an environmentally preferred alternative.

Disposal generally refers to land disposal at permitted facilities. Disposal also includes wastewater treatment plant effluent discharged to surface waters. Disposal is considered the least favored waste management alternative because of the harmful effects these wastes can have on the environment. In addition, the number of permitted waste sites available for disposing of hazardous materials and solid waste is limited and many of these sites are approaching capacity. This demand for additional capacity is leading to soaring disposal costs. There are also hazard and liability concerns associated with transportation of wastes that need to be considered as well.

EXECUTIVE ORDER 12856

To promote pollution prevention as the preferred environmental management technique throughout the Federal government, the President issued numerous Executive Orders (EO). These orders instruct Federal agencies to integrate waste reduction, reuse and recycling programs into their environmental management initiatives. The DoD pollution prevention goal is to:

Effectively promote the national policy of pollution prevention through education, training awareness, acquisition practices, facilities management, energy conservation, and the use of innovative pollution prevention techniques.

Specifically, *EO 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements* (August 3, 1993), requires that all Federal agencies comply with the provisions of both the *Emergency Planning and Community Right-to-Know Act* of 1986 (EPCRA) and the *Pollution Prevention Act* (PPA) of 1990.

Compliance with EPCRA means providing the local community with an enhanced awareness of the products stored at the facility and includes meeting the requirements for (1) emergency planning, (2) emergency notification, and making available to the public (3) inventories for chemical storage, and (4) inventories of chemical releases. Compliance with PPA means embracing the waste management hierarchy, following the preferred order for managing wastes to reduce and eliminate adverse environmental impacts.

EO 12856 also requires Federal facilities to develop a facility-specific pollution prevention program plan. The plan should set goals, identify activities, and establish a time line to reduce the facility's total releases of toxic and hazardous chemicals to the environment, and the offsite transfers of such chemicals for treatment and disposal from the facility by 50 percent by December 31, 1999, using 1992 as the baseline year. The plan should consider all activities and processes that rely on toxic and hazardous materials (e.g., vehicle maintenance, cleaning products,) .

In addition, the plan should include any other activities that may adversely impact the environment (all waste streams), consider all environmental media (i.e., land, air, and water), and identify specific activities that will result in reductions of impacts to these media. The EO does not require submission of each facility's plans to the EPA or State agencies, however, facilities will make final plans available to HQ DLA (CAAE), regulatory agencies and the public upon request.

Other regulatory and policy requirements that should be considered and included in each facility's pollution prevention plan are:

Executive Order 12902, Energy Efficiency and Water Conservation Act (March 8, 1994) directs the reduction of overall energy use in Federal buildings (with 1985 as the baseline year) by 30 percent by 2005. It also directs increased overall energy efficiency in industrial facilities by 20 percent by 2005 and significantly increases the use of solar and renewable energy sources. Federal facilities are to minimize the use of petroleum products by switching to less polluting alternative energy sources.

Executive Order 12843, Procurement Requirements and Policies for Federal Agencies for Ozone-Depleting Substances (April 21 1993) maximizes usage of alternatives to ozone-depleting substances, and modifies procurement specifications and practices to substitute non-ozone-depleting substances.

Executive Order 12844, Federal Use of Alternative Fueled Vehicles (April 21, 1993) calls on each agency to procure and use alternative fueled vehicles, where possible, to reduce toxic and hazardous air pollutants. While your facility may not be scheduled to purchase such vehicles, you should investigate the purchasing of such vehicles if possible.

Executive Order 12845, Purchasing Energy Efficient Computer Equipment (April 21, 1993) requires meeting EPA "Energy Star" efficiency guidelines in the purchase of computer equipment.

Executive Order 12898, Federal Actions to Address Environmental Justice (April 21, 1993) encourages Federal facilities to document environmental impacts in environmental justice areas and target such impacts for reduction through pollution prevention.

State and Local Jurisdiction Requirements - As of April 1, 1992, more than half of the States have passed pollution prevention laws, some States passing more than one. Still other States are expected to soon enact their initial pollution prevention legislation. Although the details of pollution prevention initiatives vary from State to State, the State governments remain a major proponent of pollution prevention.

Many States and localities have passed recycling statutes. These laws, under certain circumstances, require specific reductions in solid waste through recycling or identify specific materials, such as paper, glass, cardboard, and aluminum, to be separated from municipal solid waste. Numerous States have also passed pollution prevention planning requirements. Unique pollution prevention requirements of those States where DNSCs are located should be incorporated into each DNSC plan.

DNSC POLLUTION PREVENTION PLAN

Pursuant to E.O.12856, the Defense National Stockpile Center shall take the following actions to comply with this order to reduce and prevent pollution at all DNSC operations to the maximum extent possible.

DNSC Depots should identify local and state pollution and prevention and recycling requirements and take necessary actions to comply with these local and/or state requirements.

All DNSC depots, if not already performing this process will recycle all motor oil, antifreeze, hydraulic fluid and any other maintenance type chemicals to the maximum extent possible. You may use DLA/DRMO's or local vendors for this purpose. Please

ensure that all appropriate documentation is obtained and maintained on file.

All DNSC depots will use recycled materials, i.e., paper products, cardboard, copier products, retread tires etc. This should be accomplished to the maximum extent possible. Please document all such efforts and maintain on file.

Where possible, the vehicles used at DNSC depots to fulfill mission requirements will use alternative fuels where available. Most of our fleet vehicles are obtained through the General Services Administration (GSA). Please contact your fleet manager to see when and/or if these vehicles are available, and that there are enough suitable fueling locations to make the use of alternate fuel a viable alternative. Document the information you obtain and maintain on file.

The use of herbicides at DNSC depots will be reduced as much as reasonably possible. Herbicide application should be limited to areas that are absolutely necessary for security and mission accomplishment. Grass cutting, gravel, stone, mulch, etc. may be used around hydrants, along fenceline perimeters, buildings, and roadways to maintain these areas free of weeds and grasses rather than using herbicides. Each facility where herbicides are presently being applied will review the need for continued application of herbicides and whether or not an alternate means of weed control can be used. Open fields should be left unattended, unless this breeches security. Roadways should be cut 4 to 6 feet along both sides of the roadway rather than applying herbicides to these areas. Basically, only control what we need to control.

Where it is practical and economically feasible, the DNSC will adopt environmentally beneficial landscaping practices that complement and enhance the local environment and minimize the adverse effects that the landscaping might have. The DNSC will use landscaping practices and technologies such as growing native plant species and composting to conserve water and prevent pollution. The DNSC will adopt integrated pest management techniques to reduce the use of pesticides and to achieve the goal set forth in this plan. DNSC will follow the DNSC Pest Management Plan as established by DLA and current DoD pest management policies.

All DNSC depots will develop and implement stormwater pollution prevention plans (SWPPP) in accordance with the requirements of their individual or general stormwater permit. These plans will identify potential sources of pollution that may reasonably be expected to affect the quality of stormwater discharges from the facility. In addition the plans will describe and ensure the implementation of practices that will be used to reduce the pollutants, if any, in stormwater discharges and to assure compliance with the terms and conditions of the permit. Concurrently, the U.S.Army Center for Health Promotion and Preventive Medicine (USACHPPM) is preparing SWPPP's for Warren, New Haven, and Hammond Depots. These plans will serve as prototypes, as appropriate, for development of the remaining SWPPP's.